

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In Re:
Theodore Ansell,
Debtor(s)

Key Bank NA, as S/B/M to First Niagara
Bank, NA
Movant(s)

v.
Theodore Ansell, and Ronda J. Winnecour,
Trustee
Respondent(s)

Bankruptcy No. 18-20259-GLT

Chapter 13

Related to Claim # 4

DECLARATION THAT EXISTING CHAPTER 13 PLAN IS SUFFICIENT TO
FUND THE PLAN WITH THE MODIFIED DEBT

1. Key Bank NA, as S/B/M to First Niagara Bank, NA filed a Notice of Mortgage Payment Change on May 22, 2018.
2. Debtor's current escrow account payment remains unchanged.
3. Debtor's principal and interest payment remains unchanged
4. Debtor's current total payment is \$144.43 per month.
5. Debtor's new total payment is \$150.32 per month.
6. Debtor believes and avers that the current confirmed plan is sufficient without the need for amendment as the escrow payment has decreased.

Date: May 23, 2018

/s/ Corey J. Sacca

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